

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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MICHAEL A. LEE, JR.,

Plaintiff,

v.

Case No. 2:22-CV-00930

GINA AMBASAN,

Defendant.

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**RESPONSE TO PLAINTIFF'S REQUESTS FOR ADMISSIONS**

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The defendant, Gina Ambasan, respond to Plaintiff's Request for as follows:

**REOUEST NO. 1:** Admit that you interacted with Plaintiff Michael Lee as part of your job duties as a Correctional Officer.

Response: Admit.

**REOUEST NO. 2:** Admit that you had a personal relationship with Plaintiff Michael Lee while he was incarcerated at the Racine Correctional Institution.

Response: Deny.

**REOUEST NO. 3:** Admit that you engaged in a sexual act with Plaintiff Michael Lee.

Response: Deny.

**REOUEST NO. 4:** Admit that you had sexual contact with Plaintiff Michael Lee.

Response: Deny.

**REOUEST NO. 5:** Admit that you kissed Plaintiff Michael Lee while he was incarcerated at the Racine Correctional Institution.

Response: Deny.

**REOUEST NO. 6:** Admit that you had phone sex with Plaintiff Michael Lee.

Response: Upon reasonable inquiry, the concept of phone sex has no definition known or readily obtainable by the answering defendant is insufficient to enable her to admit or deny the request as stated.

**REOUEST NO. 7:** Admit that you talked with Plaintiff Michael Lee on the phone on May 25, 2019.

Response: Upon reasonable inquiry, the defendant has no recollection of the date known or readily obtainable by the answering defendant is insufficient to enable her to admit or deny the request as stated.

**REOUEST NO. 8:** Admit that you talked with Plaintiff Michael Lee on the phone on August 23, 2018.

Response: Upon reasonable inquiry, the defendant has no recollection of the date known or readily obtainable by the answering defendant is insufficient to enable her to admit or deny the request as stated.

**REOUEST NO. 9:** Admit that you delivered a cell phone to Plaintiff Michael Lee while he was incarcerated at the Racine Correctional Institution.

Response: Deny.

**REOUEST NO. 10:** Admit that you spoke to Plaintiff Michael Lee on the phone from February 1, 2018, through May 20, 2020 at least twenty times.

Response: Upon reasonable inquiry, the defendant has no recollection of the dates known or readily obtainable by the answering defendant is insufficient to enable her to admit or deny the request as stated.

**REOUEST NO. 11**: Admit that Attorney Thomas Devine notarized your affidavit (ECF #28) filed in this matter on April 12, 2023.

Response: Admit.

Dated March 14, 2024.

DEVINE HAHN, S.C.

By: 

Thomas M. Devine, Bar No. 1017536  
Attorneys for Defendant,  
Gina Ambasan

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